



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I
JOHN F. KENNEDY FEDERAL BUILDING
BOSTON, MASSACHUSETTS 02203-0001

March 17, 1997

James Shafer, Remedial Project Manager
U.S. Department of the Navy
Naval Facilities Engineering Command
Northern Division
10 Industrial Highway
Code 1823, Mail Stop 82
Lester, PA 19113-2090

Re: Draft Final Derecktor Shipyard Marine Ecological Risk Assessment Report - Naval
Education and Training Center, Newport, RI

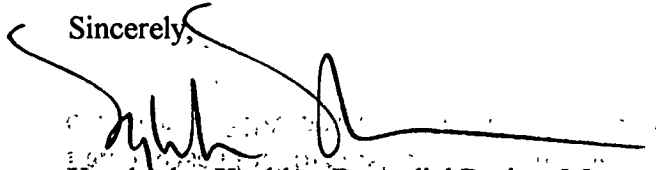
Dear Mr. Shafer:

I am writing in response to your request for EPA to review the *Draft Final Derecktor Shipyard Marine Ecological Risk Assessment Report*, dated February 11, 1997. EPA reviewed this document in light of its responsiveness to EPA's letter dated August 29, 1996 and the discussions held at various ecological advisory board meetings. Detailed comments are provided in Attachment A.

I am pleased that the text and Section 6 tables have been revised to address the majority of EPA's comments. EPA, however, was unable to confirm the calculations because Appendix A lacked supporting information relative to hazard quotient calculations. For example, Tables A-2-4.2 through A-2-4.5 do not provide the prey species concentration and toxicity reference values. Tables A-2-1.1 & 2 and A-2-2.1 do not provide or reference the ER-L, ER-M values or the AWQC saltwater chronic values used. Table A-2-3.1 does not provide the mean chemical concentration from the reference stations. Could you please provide this information so that we can discuss it at our next ecological advisory board meeting?

I look forward to working with you and the Rhode Island Department of Environmental Management toward the cleanup of the Derecktor Shipyard. Please do not hesitate to contact me at (617) 573-5777 should you have any questions before our March 26, 1997 meeting.

Sincerely,


Kimberlee Keckler, Remedial Project Manager
Federal Facilities Superfund Section

1857



Recycled/Recyclable
Printed with Soy/Canola Ink on paper that
contains at least 75% recycled fiber

Attachment

**cc: Paul Kulpa, RIDEM, Providence, RI
Brad Wheeler, NETC, Newport, RI
Susan Svirsky, USEPA, Boston, MA
Jennifer Hayes, Gannet Fleming, Harrisburg, PA
Ken Finkelstein, NOAA, Boston, MA
Steven Parker, Brown & Root, Wilmington, MA**

ATTACHMENT A

<u>Page</u>	<u>Comment</u>
p. 6-12, §6.2.2.2, ¶ 2 (12)	As discussed at the October 16, 1996 EAB meeting, the text was revised to clarify the relevance of the narcosis theory to organometals and metals. Also, a supporting reference for using the narcosis model for metals has been added to the first paragraph (McCarty and Mackay, 1993) in Section 6.2.2.2. A full reference for the other literature citation (McCarty <i>et al.</i> , 1992) in this discussion was not provided in the Draft ERA and is not provided in the revised ERA. Since McCarty was published several times in 1992, it is unclear which article is being cited.
p. 6-45, § 6.6, Table 6.6-3 (13)	For station DSY-24, the exposure ranking according to the definition provided in footnote 9 would be "Low." The definition does not include variances due to lack of data. An additional footnote should be provided to explain why the exposure rank of "Intermediate" is listed in Table 6.6-3. The "Overall Risk Probability Ranking" for the Jamestown Potter Cove (JPC-1) should be "Intermediate" according to the definition provided in footnote number 10.
pp. 8-1 to 8-24, §8-0 (15)	Page and Widdows (1991) and Hoke <i>et al.</i> (1991) need to be cited in the revised Table 6.2-4 and the references. Borgman <i>et al.</i> (1991) is cited in the table but is not cited in the Section 8.0 references.
Appendices A-2-2.1 to A-2-2-5 (17)	A footnote was added to Tables A-2-3.1-5 specifying the units of data "% of reference, decimal fraction (%/100)." However, the response to EPA comments states, "A footnote including the calculation equation, the source of reference data, and the units of the data...will be added to improve clarity." The equation and the source of reference data are not provided as footnotes to the tables. Relevant equations should be provided to allow confirmation of the calculations. Also a footnote should state that species and analyte specific data collected from the Jamestown Potter Cove and the Castle Hill Cove reference stations were numerically averaged to yield a single estimate for the reference-based value.